

July 19, 2023

Janet M. de Jesus, MS, RD
Office of Disease Prevention and Health Promotion
Office of the Assistant Secretary for Health
1101 Wootton Parkway Suite 420
Rockville, MD 20852

Re: Federal Register Notice HHS-OASH-2022-0021-0001: 2025 Dietary Guidelines Advisory Committee

Dear Ms. de Jesus and the 2025 Dietary Guidelines Advisory Committee,

Thank you for the opportunity to provide input on the proposed Nutrition Evidence Systematic Review protocols that will be used by the 2025 Dietary Guidelines Advisory Committee (DGAC) as part of the evidence review for the 2025-2030 *Dietary Guidelines for Americans* (DGA). We appreciate the opportunity to have input into the process and the commitment to a strong evidence-review process.

The Plant Based Foods Association (PBFA) is the only trade association in the U.S. representing over 320 of the nation's leading plant-based food companies. PBFA's mission is to champion, strengthen, and elevate our members and the plant-based food industry. PBFA empowers the industry by advocating for government policies that allow fair competition while expanding market opportunities for retail, distribution, and foodservice to support the continued growth of the plant-based foods industry.

PBFA defines plant-based foods as "foods made from plants that contain no animal derived ingredients." We define plant-based diets as "dietary patterns that emphasize whole, plant-based foods, such as fruits, vegetables, whole grains, legumes, nuts and seeds and plant-based alternatives (and limit or exclude animal-derived products)."

We are commenting specifically on the protocols related to dietary patterns and milk alternatives.

Dietary Patterns Protocols

PBFA strongly supports the DGAC's focus on health equity and the importance of personal, cultural, and traditional preferences and dietary needs. This is particularly important when it comes to dietary patterns, acknowledging that there are numerous ways to consume a healthy diet and a range of foods that have not historically been included in research studies and U.S. dietary guidance. For the Dietary Guidelines to be applicable and implementable, the inclusion of a range of dietary patterns that represent the wide range of foods that can meet dietary recommendations is needed.

We support the DGAC's approach on not determining specific dietary patterns to review, but rather, gathering data on dietary patterns overall and then assessing how dietary patterns are defined in the research and the connections with health outcomes. There is a broad range of "plant-based diet" definitions found within the published literature and pre-identifying dietary patterns may limit inclusion of relevant studies. Various eating patterns represent and include plant-based foods and plant-based diets. Including a diversity of dietary patterns within evidence review and subsequent recommendations will support the DGAC's focus on health equity.

Dairy Milk and Milk Alternative Consumption Protocols

PBFA strongly supports inclusion of plant-based milks in the following questions:

- What is the relationship between dairy milk and milk alternative consumption and growth, body composition, and risk of obesity?
- What is the relationship between dairy milk and milk alternative consumption and risk of type 2 diabetes?

To fully capture the evidence-base for plant-based milks, the literature review must include the many names that may be used for these beverages. Some of these names include nondairy beverages, nondairy products, plant-based beverages, plant-based milk, as well as product specific names such as almond milk, oat milk, rice milk, pea milk, hemp milk and plant-based milk blends. These are just some examples of the growing sector of plant-based milks. In addition, the DGAC may want to consider the broader category of plant-based yogurts as part of this protocol.

Thank you for your consideration and thoughtful approach to the evidence-review process.

Sincerely,



Nicole Negowetti
Vice President of Policy & Food Systems